

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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PAUL BASS-LEVITIN,	:	
	:	Case No. 1:20-cv-00430-ER
Plaintiff,	:	
	:	
vs.	:	
	:	STIPULATION TO STAY
EXPERIAN INFORMATION SOLUTIONS, INC.,	:	ACTION PENDING
TRANS UNION (of Delaware), LLC, EQUIFAX	:	ARBITRATION
INFORMATION SERVICES, BARCLAYS BANK	:	
DELAWARE,	:	
DISCOVER FINANCIAL SERVICES, INC. and	:	
JPMORGAN CHASE BANK, N.A.,	:	
	:	
Defendants.	:	
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WHEREAS, defendant Discover Bank (“Discover”), improperly sued as Discover Financial Services, has demanded that plaintiff Paul Bass-Levitin (“Plaintiff”) arbitrate his claims against Discover in accordance with the operative arbitration agreement contained in Plaintiff’s Discover Cardmember Agreement;

WHEREAS, Plaintiff has agreed to submit his claims against Discover to arbitration; and

WHEREAS, in accordance with 9 U.S.C. § 3, the parties request a stay of all proceedings and deadlines in this action as to Discover pending the conclusion of arbitration;

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff and Discover, through their respective counsel, that: (1) all of Plaintiff’s claims against Discover in this action shall be arbitrated pursuant to the written agreement between Plaintiff and Discover; and (2) all proceedings in this matter as to Discover, including any pending deadlines, are stayed pending completion of arbitration.

IT IS FURTHER STIPULATED AND AGREED that by executing this Stipulation, Plaintiff does not waive or otherwise forgo any potential challenge to the purported agreement to arbitrate.

Dated: New York, New York
March 5, 2020

Respectfully Submitted,

STROOCK & STROOCK & LAVAN LLP

By: /s/ Arjun P. Rao
Arjun P. Rao

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Attorneys for Defendant
DISCOVER BANK.

Dated: New York, New York
March 3, 2020

LAW OFFICE OF ABEL L. PIERRE,
ATTORNEY-AT-LAW, P.C.

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Attorneys for Plaintiff
PAUL BASS-LEVITIN

Dated: March ___, 2020

SO ORDERED:

EDGARDO RAMOS
United States District Judge